

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

VINCENT KHOURY TYLOR,)	CIVIL NO. CV13 00279 SOM/BMK
)	
Plaintiff,)	CROSS-CLAIM FOR
)	DECLARATORY RELIEF AS TO
vs.)	DEFENDANT MARILOU LORICA
)	
MARILOU LORICA; KAILUA)	
REALTY LTD., a Hawaii Corporation)	
dba CENTURY 21 KAILUA BEACH)	
REALTY; PRUDENTIAL)	
LOCATIONS LLC, a Hawaii Domestic)	
Limited Liability Company; JOHN)	
DOES 1-10; JANE DOES 1-10; DOE)	
CORPORATIONS 1-10; DOE)	
PARTNERSHIPS 1-10; and DOE)	
ASSOCIATIONS 1-10,)	
)	
Defendants.)	
_____)	

CROSS-CLAIM FOR DECLARATORY RELIEF
AS TO DEFENDANT MARILOU LORICA

Defendant Kailua Realty Ltd. dba Century 21 Kailua Beach Realty

(hereinafter "Defendant Century 21") hereby asserts as its cross-claim for
declaratory relief against Defendant Marilou Lorica as follows:

1. Defendant Marilou Lorica is a resident of the City & County of
Honolulu, State of Hawaii and at all times relevant herein was a licensed real estate
agent.

2. Defendant Century 21 was, at all times relevant herein, a licensed real estate business with proper licenses to conduct real estate business in the State of Hawaii.

3. At all times relevant herein the relationship between Defendant Marilou Lorica and Defendant Century 21 was one of independent contractor.

4. At the relevant times herein, Defendant Marilou Lorica was never an employee of Defendant Century 21.

5. At the relevant times herein Defendant Marilou Lorica was never an officer or director of Defendant Century 21.

Wherefore, Defendant Century 21 prays that this Court determine and declare the sole relationship between Defendant Marilou Lorica and Defendant Century 21 was that of independent contractor.

DATED: Honolulu, Hawaii, September 25, 2013.

/s/Roy F. Hughes

ROY F. HUGHES

Attorney for Defendant

KAILUA REALTY LTD. dba CENTURY
21 KAILUA BEACH REALTY